

EXHIBIT 8

Sub Ref Km 239

ECC MAIL SECTION

Dec 18 1 33 PM '91

DEC 17 1991

DISPATCHED

6940-00

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. T. Earl Atkins
Channel 54 Broadcasting, Inc.
7921 Brown Trail
Suite 140
Bedford, Texas 76021

Re: STCT-901206KT
KTHP(TV)
Longview, Texas

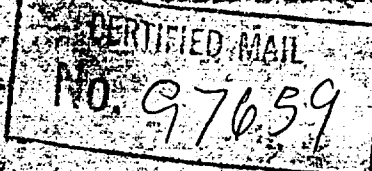
Dear Mr. Atkins:

This refers to the above-captioned application to replace the expired construction permit for television station KTHP(TV), Channel 54, Longview, Texas.

The Commission's records show that the underlying construction permit for this station was issued to Inga B. Hernandez, d/b/a Channel 54 Broadcasting on April 27, 1986. On July 1, 1989, you acquired the permit by assignment, and were afforded until July 1, 1990 to complete construction. You allowed your construction permit to expire and then, on December 6, 1990, you filed the instant application to replace the expired permit. In support of the application, you state that the delay in construction was due to circumstances beyond your control and the unavailability of your transmitter site.

Before an extension can be granted, Section 73.3534(b) of the Rules requires a showing that either substantial progress has been made in the construction of the station or that circumstances beyond the permittee's control prevented construction. While you state you have, nevertheless, been taken to resolve the problem, you have not shown that either of these conditions has been met.

From July 1, 1989 until July 1, 1990 and during this period, no equipment has been acquired and no construction has commenced. You have been afforded the unavailability of your transmitter site for more than one year, but there is no indication that you have taken any steps to locate a new site, and you have not filed a modification application to that end.



While the unavailability of a transmitter site is generally considered a circumstance beyond a permittee's control excusing construction, you have not demonstrated diligence in resolving the problem in order to proceed with the station's construction. That coupled with the fact that overall construction has progressed very little leads us to conclude that the construction permit should be cancelled. Accordingly, the above-captioned application for a construction permit to replace expired permit application IS DENIED, your construction permit IS CANCELLED and the call sign IS DELETED.

Sincerely,

Barbara A. Kreisman
Chief, Video Services Division
Mass Media Bureau

svh/SWINTON:MMB"ktlp"

Typed: 11-14-91

bcc: Ownership FM 234

Call Sign FM 701

L. Dickson FM 756

Whitmyer FM 701

FM 700

FIC, Dallas, Texas

Pub. Ref. FM 239

Hinton FM 700

EXHIBIT 9



NEWS

FEDERAL COMMUNICATIONS COMMISSION
1919 M STREET, N.W.
WASHINGTON, D.C. 20554

News media information 202 / 632-6050
Recorded listing of releases and texts
202 / 632-0002

This is an unofficial announcement of Commission action. Release of the full text of a Commission order constitutes official action. See MCI v. FCC, 515 F.2d 385 (D.C. Cir. 1975)

3788

June 26, 1987

CHIEF, VIDEO SERVICES DIVISION, REQUESTS VERIFICATION OF FINANCIAL QUALIFICATIONS OF CARL M. FISHER

Because of apparent abuses of the financial qualifications certification process, the Commission, in a Public Notice (FCC 87-97) released March 19, 1987, advised applicants and potential applicants for new broadcast stations that its staff had been directed to initiate a program of random checks on the financial qualifications of applicants for construction permits for new broadcast facilities.

The FCC authorized its staff to question the validity of the financial qualifications certifications of applicants having a large number of broadcast applications pending.

Acting pursuant to delegated authority, the Chief, Video Services Division, in a letter dated June 24, 1987, has asked Carl M. Fisher to verify his financial qualifications. [REDACTED]

Action by the Chief, Video Services Division June 24, 1987 by Letter.

- FCC -

For further information contact Gordon Oppenheimer at (202) 632-6357.

EXHIBIT 10

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In re Applications of)	MM Docket No. 92-253
)	
BAKCOR BROADCASTING, INC., DEBTOR)	File No. BRH-900330VV
c/o DENNIS ELAM, TRUSTEE)	
)	
For Renewal of License of)	
Station KKIK(FM))	
Lubbock, Texas)	
)	
SOUTHWEST EDUCATIONAL MEDIA)	File No. BPED-900629MK
FOUNDATION OF TEXAS, INC.)	
)	
For Construction Permit for a New)	
FM Station on Channel 229C1)	
Lubbock, Texas)	
 To: Honorable Walter C. Miller Administrative Law Judge		

**MOTION FOR AN ORDER
REQUIRING THE PRODUCTION OF DOCUMENTS**

Bakcor Broadcasting, Inc., Debtor, c/o Dennis Elam, Trustee ("Bakcor"), by its counsel and pursuant to Section 1.229(e) of the Commission's Rules, hereby submits its Motion for an Order Requiring the Production of Documents by Southwest Educational Media Foundation of Texas, Inc. ("SEMFOT"). Each of the individual document requests seeks documents that are relevant to the issues specified in the Motion to Enlarge the Issues filed by Bakcor on November 30, 1992.

INSTRUCTIONS

A. Each request shall be deemed to be continuing in nature. Applicant should update or revise, and otherwise keep current, any information provided in response to these requests for production of documents as facts or circumstances become known or changed.

B. If documents are not readily available in a form suitable for copying and inspection (e.g., word processor or computer-stored information), the Applicant shall, in advance of the date of production, inform counsel for the opposing parties of that fact and a suitable method of examining and/or copying will be arranged.

C. All documents in the possession, custody, or control of the Applicant or any of its Principals, Representatives or Agents which are responsive to or relate to the descriptions set forth herein shall be produced.

D. In the event that any document responsive to or related to the descriptions herein is known to the Applicant or any of its Principals to have existed but no longer exists, or to have been in the possession or control of the Applicant or its Principals but is not now in their control, identify any such documents and:

1. state the last known date for existence or of the Applicant's or its Principals' possession or control;

2. identify the person or entity having possession or custody on the last known date of existence or the

last known date of possession, custody or control by the Applicant or its Principals;

3. state the length of any such document;

4. state the reasons why the document was destroyed, no longer exists, or no longer is in the possession, custody or control of the Applicant or its Principals;

5. describe the contents of any such document;

and

6. for those documents which still exist, identify, the person(s) or entity(ies) which today have possession, custody or control.

E. In reading and interpreting the requests for documents set forth herein, the Applicant and its Principals are to give words their normal meanings and to assume the normal breadth of interpretation and definition rather than applying narrow, technical definitions.

F. If any document responsive to or related to the descriptions set forth herein, which would have been produced on the date set for production had it existed or been in Applicant's or its Principals' possession, custody or control, later comes into existence or into the possession, custody or control of the Applicant or its Principals, counsel for the other party must be notified immediately and any such document is to be produced to counsel for the other party at the earliest possible date.

G. For each document produced, identify the request to which it is deemed to be responsive.

DEFINITIONS

H. "Applicant" means, in its proper context, either Caprock Educational Broadcasting, Inc., or Southwest Educational Media Foundation of Texas, Inc.

I. "Document" means copies of the original and any non-identical copy and/or amendment thereof, of any letter, memorandum, report, handwritten note, working papers, summary of data, data compilation sheet, interview report, record, bill, receipt, cancelled check, order, audio and/or video, recording, or any other handwritten, typed, printed or graphic materials, data base or computer file or computer-generated output of any form to which applicant or any of its agents or representatives have access.

J. "Principal" for the purposes of these requests for production of documents, includes officers, directors, stockholders or members (including the officers and directors of corporations which themselves are stockholders or members) if a corporation; general and limited partners, (and, if any of the general or limited partners are themselves corporations or partnerships, general and limited partners of any such limited partnership, officers, directors and stockholders, stock subscribers, warrant holders, option holders or members of any such corporation), individuals, corporations, or partnerships

which hold a future and/or contingent interest in the partnership; members (however designated), if an unincorporated association; or the individual owner, if applicable.

K. "Persons" means natural persons, corporations, partnerships, associations, and other legal entities, governments or governmental bodies, commissions, boards, agencies, or entities.

L. "Representative" or "Agent" includes, but is not limited to, present or former legal counsel, engineering and all other consultants, accountants, employees or agents.

M. "Interest" means any form of ownership, whether direct or indirect, beneficial or legal, actual or contingent, including ownership through a corporation, partnership, association, investment company, bank or other entity, or any other form of office or other position in any business entity.

N. "Control" means that the Applicant or any of its Principals, Representatives or Agents thereof, either has the documents or the right to obtain the documents from the person(s) or entity(ies) currently having possession of the documents.

O. "Financing Documents" means all documentation relied upon to certify the applicants' financial qualifications, including, but not limited to, bank letters if relying upon a bank; or, if relying on financing other than bank financing, documents reflecting a commitment from sources other than a bank.

OBJECTIONS TO PRODUCTION

In the event that any party wishes to object to the production of one or more of the documents listed below, or any portion thereof, on grounds of privilege, such objection must be served at the offices of counsel to Bakcor on the date that the documents are to be produced.

If production of any documents called for by this request is refused pursuant to a claim of privilege, the document should be identified by reference to its author, recipient(s), date, and subject matter, and the basis for the privilege claimed should be specified with sufficient clarity so as to permit an assessment of the applicability of the privilege involved.

DOCUMENTS REQUESTED

(1) All purchase orders, invoices, cancelled checks, and other documents relating to the construction of new or modified facilities for Stations KAMY and KLMN.

(2) All promotional and other materials related to the dates that KAMY and KLMN commenced or proposed to commence operations from a new location.

(3) All newspaper articles and advertisements publicizing or reporting the commencement of operations by KAMY and KLMN from a new location.

(4) All program logs for Stations KAMY and KLMN for the months in which Stations KAMY and KLMN commenced operations from a new location.

(5) All correspondence to and from the Federal Communications Commission regarding the commencement of program tests for Stations KAMY and KLMN from a new location.

(6) All correspondence to and from the FCC seeking information on the construction and commencement of operations of Stations KAMY and KLMN from a new location.

(7) All executed agreements, correspondence and other documents related to the lease or purchase of land or tower space on which the antennas for Stations KAMY and KLMN are located.

(8) All cancelled checks showing payments made to the lessors of tower sites on which antennas for Stations KAMY and KLMN are located.

(9) All bills for electric power servicing Stations KAMY and KLMN.

(10) All employment agreements with employees of Stations KAMY and KLMN.

(11) All documents relating to plans or proposals to fund the construction and/or operation of any facility for which an application in which T. Kent Atkins and/or Mary Helen Atkins had an interest as of July 1, 1990, and which such application was pending before the Commission on that date.

(12) All budgets relating to the construction and/or operation of any facility for which an application in which T. Kent Atkins and/or Mary Helen Atkins had an interest as of July 1, 1990, and which such application was pending before the Commission on that date.

(13) All documents relied upon to establish financial qualifications for the applications described in items (11) and (12) immediately above.

(14) All documents relating to the proposed program service of SEMFOT for a new facility on Channel 229C1 at Lubbock, Texas.

(15) Any agreements with educational institutions for providing to or receiving from SEMFOT programming for a new facility on Channel 229C1 at Lubbock, Texas.

(16) All documents related to fundraising efforts by SEMFOT and other organizations in which T. Kent Atkins or Mary Helen Atkins is a principal.

(17) All documents related to expenditures made by SEMFOT and other noncommercial applicants, permittees or licensees in which T. Kent Atkins or Mary Helen Atkins is a principal, including but not limited to financial statements, ledgers, audits, tax returns, payroll and expense records related to T. Kent Atkins and Mary Helen Atkins.

(18) All documents related to the non-profit status of SEMFOT and other noncommercial applicants, permittees or

licensees in which T. Kent Atkins or Mary Helen Atkins is a principal.

(19) All documents related to or establishing SEMFOT's compliance with Section 73.503 of the Commission's Rules.

CONCLUSION

The foregoing requests seek documents relevant to, or likely to lead to evidence relevant to, the additional issues sought by Bakcor against SEMFOT. Bakcor requests an order requiring the production of documents as set forth herein.

Respectfully submitted,

BAKCOR BROADCASTING, INC., DEBTOR
DENNIS ELAM, TRUSTEE

By: _____

Lawrence Roberts
Linda J. Eckard

[DATE]

CERTIFICATE OF SERVICE

Linda J. Eckard hereby certifies that she has sent a copy of the foregoing JOINT MOTION FOR PRODUCTION OF DOCUMENTS by first class U.S. Mail, postage prepaid, or by hand delivery on this _____ day of _____, 1992, to the following:

*Honorable Walter C. Miller
Administrative Law Judge
Federal Communications Commission
2000 L Street, Second Floor
Stop Code 0900
Washington, D.C. 20554

*Paulette Laden, Esq.
Hearing Branch, Enforcement Division
Mass Media Bureau
Federal Communications Commission
2025 M Street, N.W., Room 7212
Washington, D.C. 20554

James L. Oyster
Law Offices of James L. Oyster
Route 1, Box 203A
Castleton, VA 22716

Linda J. Eckard

* By Hand

CERTIFICATE OF SERVICE

Patricia A. Druliner hereby certifies that she has sent a copy of the foregoing MOTION TO ENLARGE THE ISSUES by first class U.S. mail, postage prepaid, or by hand delivery, on this 30th day of November, 1992, to the following:

*Honorable Walter C. Miller
Administrative Law Judge
Federal Communications Commission
2000 L Street, Second Floor
Stop Code 0900
Washington, D.C. 20554

*Paulette Laden, Esq.
Hearing Branch, Enforcement Division
Mass Media Bureau
Federal Communications Commission
2025 M Street, N.W., Room 7212
Washington, D.C. 20554

James L. Oyster
Rt. 1, Box 203A
Castleton, VA 22716


Patricia A. Druliner

*By Hand Delivery